

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT OF WASHINGTON  
AT WESTERN DISTRICT SEATTLE

JULIE DALESSIO, an individual,  
  
Plaintiff,  
  
v.  
  
UNIVERSITY OF WASHINGTON,  
  
Defendant.

No. 2:17-cv-00642 TSZ

DEFENDANT UNIVERSITY OF  
WASHINGTON'S INITIAL  
DISCLOSURES

COMES NOW DEFENDANT, by and through counsel of record Special Assistant Attorney General Jayne L. Freeman and make the following initial disclosures required by Federal Rule of Civil Procedure 26(a)(1) based on information available to Defendant to date. Defendant reserves the right to supplement this initial disclosure as discovery is conducted and disclosures are made by Plaintiff.

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION.**

The following individuals are likely to have discoverable information, which Defendant may use to support its claims or defenses.

1. Alison Swenson  
c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

Ms. Swenson prepared the responses to public records requests cited by Plaintiff in her Complaint. She has knowledge of the redaction process and the facts regarding the

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1010-00051/287652

KEATING, BUCKLIN & MCCORMACK, INC., P.S.

ATTORNEYS AT LAW  
800 FIFTH AVENUE, SUITE 4141  
SEATTLE, WASHINGTON 98104-3175  
PHONE: (206) 623-8861  
FAX: (206) 223-9423

1 public records productions at issue in this case and communications with Plaintiff.

2 2. Julie Dalessio  
3 1110 29th Ave.  
4 Seattle, WA 98122  
(206) 324-2590

5 Ms. Dalessio is the plaintiff in this case and has knowledge of facts regarding the  
6 allegations in her Complaint.

7 3. Robert Kosin, Assistant Attorney General  
8 University of Washington Attorney General's Office  
9 c/o Keating, Bucklin & McCormack, Inc., P.S.  
10 800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

11 Mr. Kosin has knowledge of regarding a contact with Plaintiff in 2016. Mr. Kosin  
12 may also have knowledge of privileged attorney client communications and/or work  
13 product. By disclosing AAG Kosin as an individual with knowledge of some non-  
14 privileged information, the University does not in any way intend to waive any applicable  
15 privileges that may apply.

16 4. David Betz  
17 1325 4<sup>th</sup> Avenue Suite 1400  
18 Seattle, WA 98101-2573  
(206) 457-4121

19 Mr. Betz has knowledge of facts regarding a public records request he made to the  
20 University of Washington, and the adverse possession lawsuit regarding which Plaintiff  
21 alleges some of her damages arise.

22 5. Perry Tapper  
23 Public Records Compliance Officer  
24 Office of Public Records and Open Public Meetings  
25 c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

26 Mr. Tapper has knowledge of Plaintiff's contact with the Office of Public Records.

6. Eliza Saunders  
Director of the Office of Public Records  
Office of Public Records and Open Public Meetings  
c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

Ms. Saunders has knowledge of the University's Public Records Office operations, policies, and procedures.

7. Barb Benson  
Records Management Services  
c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

Ms. Benson has knowledge regarding records retention policies at the University of Washington.

8. Lumilla Barbacar, Civil Rights Investigator  
Washington State Human Rights Commission  
711 South Capitol Way, Suite 402  
P.O. Box 42490  
Olympia, WA 98504-2490  
(360) 359-4921

Ms. Barbacar has knowledge regarding a complaint Plaintiff filed with the Human Rights Commission in 2016 and communications with Plaintiff regarding it.

9. Laura Skinner, Executive Asst. to the Commissioners  
Washington State Human Rights Commission  
711 South Capitol Way, Suite 402  
P.O. Box 42490  
Olympia, WA 98504-2490  
(360)359-4921

Ms. Skinner has knowledge regarding a petition for reconsideration filed with the Human Rights Commission by Plaintiff and communications with Plaintiff.

10. Andrew Palmer  
c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

Mr. Palmer may have knowledge regarding assembling the response to PR 16-00760.

11. Lori Oliver  
c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

Ms. Oliver may have knowledge regarding assembling the response to PR 16-00760.

11. Mindy Kornberg  
c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

Ms. Kornberg may have knowledge regarding assembling responses to Plaintiff's and/or David Betz' public records requests.

11. Cynthia Dold  
c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

Ms. Dold may have knowledge regarding assembling responses to PR 15-00570.

## II. DOCUMENTS AND TANGIBLE THINGS IN POSSESSION OF DEFENDANTS THAT MAY BE USED TO SUPPORT ITS DEFENSES:

Doc. No.	Description	Bates Range	Date Produced to Plaintiff in Litigation
1.	Plaintiff Julie Dalessio tort claim dated October 21, 2016	UW00001-00003	June 1, 2017
2.	PR-2015-00570 (Betz) Public Records Request 9.16.15 (for Dalessio documents) and related	UW00004-000392	June 1, 2017

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Doc. No.	Description	Bates Range	Date Produced to Plaintiff in Litigation
	documents Produced: 11.20.2015 and 12.4.2015		
3.	PR-2016-00218 (Dalessio) Public Records Request 3.25.2016 (for copies of documents released to Betz) and related documents Produced: 4.5.2016	UW000393-UW000778	June 1, 2017
4.	PR-2016-00283 (Dalessio) Public Records Request 4.16.2016 (for information re who accessed her records) and related documents Response: 4.27.16	UW000779-000787	June 1, 2017
5.	PR 2016-00760 Public Records Request (Dalessio) 11.09.2016 (for her entire personnel file and related records) and related records Produced: 1.26.2017 and 2.15.2017	UW000788-001936	June 1, 2017
6.	2003 Settlement Agreement	UW001937-001940	June 1, 2017
7.	Plaintiff Julie Dalessio Summons & Complaint served April 3, 2017	UW001941-1980	June 1, 2017
8.	Correspondence between Plaintiff Julie Dalessio and the University	UW001981-001988	June 1, 2017

### III. COVERAGE

The University of Washington and its employees, agents, and students are covered for liabilities arising from negligent acts and or omissions committed in the course and scope of their University duties. This coverage is provided through a self-funded program established pursuant to RCW 28B20.250 et seq., and governed by the Standing Orders of the Board of Regents. The liability program provides unlimited coverage, operates on an occurrence basis, and applies at all approved sites of practice or education.

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FAX: (206) 223-9423



**DECLARATION OF SERVICE**

I declare that on June 1, 2017, I caused a true and correct copy of the foregoing document to be served on the party listed below *via email* and *First Class U.S. Mail*:

**Attorneys for Pro-Se Plaintiff**

Julie Dalessio  
1110 29th Ave.  
Seattle, WA 98122  
Telephone: (206) 324-2590  
Email: [juliedalessio@msn.com](mailto:juliedalessio@msn.com)

DATED: June 1, 2017

*/s/ LaHoma Walker*

LaHoma Walker, Legal Assistant